



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 Forsyth Street
Atlanta, Georgia 30303

March 27, 2003

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ATSDR/DHAC/PERISB

4WD-FFB

Mr. Max M. Howie, Jr.
Chief, Program Evaluation, Records
and Information Services Branch
Division of Health Assessment
and Consultation

SUBJ: Initial Release - Draft Public Health Assessment
Y-12 Uranium Releases
U.S. Department of Energy - Oak Ridge Reservation

Mr. Howie:

The Environmental Protection Agency (EPA) has completed its review of the subject document and is forwarding the enclosed comments. EPA concurs with the assessment's conclusion that the available data does not indicate the presence of uranium releases that constitute a past, current or future health threat for the Scarboro Community. However, the representativeness of Scarboro data for other communities should be thoroughly described, including the uncertainty of the conclusions for those communities that are more directly downwind from the plant's air discharges. The enclosed comments also address concerns pertaining to the methodologies used for determining carcinogenic risk.

If you have any questions regarding this matter, please contact me at (404) 562-8546, or Mr. Jon Richards at (404) 562-8648.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Crane".

Jeff Crane, FFA Project Manager
DOE Section
Federal Facilities Branch
Waste Management Division
Environmental Protection Agency Region 4

cc: Dave Adler, DOE-OR
Randy Young, TDEC
Jack Hanley, ATSDR



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 Forsyth Street
Atlanta, Georgia 30303**

June 20, 2003

4WD-FFB

Max M. Howie, Jr., M.S., Chief
Program Evaluation, Records
and Information Services Branch
Division of Health Assessment
and Consultation
ATSDR, Mailstop E-60
1600 Clifton Road, NE
Atlanta, GA 30333

SUBJ: Draft Public Health Assessment - Public Comment Release (April 22, 2003)
Y-12 Uranium Releases
U.S. Department of Energy - Oak Ridge Reservation

Dear Mr. Howie:

The Environmental Protection Agency (EPA) Region 4 (R4) has completed its review of the subject document and is forwarding the enclosed comments. EPA R4 previously reviewed the December 31, 2002, "Initial Release" draft Public Health Assessment (PHA) and forwarded comments on March 27, 2003. EPA finds that the April 22, 2003 "Public Comment Release" draft PHA did not fully address our comments. Accordingly, EPA R4 is forwarding the comments, with minor revisions, that had been previously raised during our review of the "Initial Release" draft PHA. EPA R4 appreciated the opportunity to discuss these comments with Mr. Jack Hanley and Mr. Paul Sharp on June 19, 2003, and would be happy to further discuss these matters if you have additional questions.

EPA R4 concurs with the draft PHA conclusion that the available data does not indicate the presence of uranium releases that constitute concern for the Scarboro Community. However, the representativeness of Scarboro data for releases to other areas should be more thoroughly described, including the uncertainty of the conclusions for any communities that may be more directly down-wind from the plant's air discharges.

If you have any questions regarding this matter, please contact me at (404) 562-8546, or Mr. Jon Richards at (404) 562-8648.

Sincerely,



Jeff Crane, FFA Project Manager
DOE Section
Federal Facilities Branch
Waste Management Division
Environmental Protection Agency Region 4

cc: Dave Adler, DOE-OR
Randy Young, TDEC ←
Jack Hanley, ATSDR



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY**

**REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303**

December 1, 2003

4WD-FFB

Jack Hanley, M.P.H.
Division of Health Assessment and Consultation
Agency for Toxic Substances and Disease Registry
1600 Clifton Rd., NE, Bldg. 31 E32
Atlanta, GA 30329

**SUBJ: Responses to Comments on the
*Public Health Assessment, Y-12 Uranium Releases
Oak Ridge Reservation (USDOE), Oak Ridge, Anderson County, Tennessee***

Dear Mr. Hanley:

The Environmental Protection Agency (EPA) Region 4 has completed its review of the draft responses to comments provided informally by the Agency for Toxic Substances and Disease Registry (ATSDR) for the subject document. Although EPA's Office of Indoor Air and Radiation (ORIA) provided more detailed comments, the two sets of comments were consistent on the primary issues raised regarding the uncertainty in the conclusions and the risk methodology used by ATSDR in the subject document. For the comments originating from EPA Region 4, we conclude that ATSDR has provided adequate responses. EPA Region 4 notes that some of the ATSDR comment responses to the detailed comments provided by ORIA may require further consultation between ATSDR and ORIA. We encourage your staff to contact ORIA to address any of these technical comments.

The ATSDR's Public Health Assessment (PHA) confirms the conclusions from EPA's sampling study of the Scarboro area, that there are no public health concerns to the community. In accordance with the milestones in the Federal Facility Agreement, the Department of Energy will complete a preliminary assessment/site investigation of off-site areas pending completion of the ATSDR PHA's. Any necessary follow-on activities will be addressed during this assessment.

Although EPA agrees with ATSDR that there are no apparent adverse health effects, as documented in the subject report, EPA does not agree with the dose or risk criteria ATSDR uses for assessing potential long-term chronic cancer risks, (i.e., 5000

mrem/year over 70 years). We understand that ATSDR currently uses the Superfund risk range for chemical carcinogens but not for radionuclides. Although EPA risk assessments and ATSDR public health assessments are not equivalent, EPA believes that ATSDR should be consistent and use the Superfund risk range for both chemical and radiation risks. Based on your response to comments, we understand ATSDR is using an external panel of epidemiologists and radiation experts and are willing to change based on their input. We highly recommend these experts include representatives from EPA's Office of Radiation and Indoor Air, the Office of Solid Waste and Emergency Response, and EPA's Science Advisory Board, Subcommittee on Radiation.

If you have any further questions, please contact me at 404/562-8546, or our radiation support contact, Jon Richards, at 404/562-8648.

Sincerely,



Jeffrey L. Crane
Federal Facility
Agreement Project Manager,
Oak Ridge Reservation
Federal Facilities Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 9 2004

OFFICE OF
AIR AND RADIATION

Kowetha A. Davidson, Ph.D
Chair, Oak Ridge Reservation Health Effects Subcommittee
c/o ATSDR Oak Ridge Field Office
P.O. Box 5088
Oak Ridge, TN 37831-5088

Dear Dr. Davidson:

Thank you for your letter dated November 21, 2003 inviting a representative from the U.S. Environmental Protection Agency (EPA) Headquarters to attend your subcommittee meeting on December 3, 2003. Unfortunately, there was not enough time following receipt of your letter to arrange for a representative to attend.

In your letter you raise concerns about separate comments from EPA Region 4 and EPA Headquarters. I agree that, ideally, one set of comments from EPA is desirable and apologize for any confusion this caused the subcommittee. We coordinated closely with Region 4 and I can assure you that there is no disagreement between EPA Region 4 and Headquarters over either the content of the letters or the technical comments provided to the Agency for Toxic Substances and Disease Registry (ATSDR).

We have reviewed the draft responses to comments provided informally by the ATSDR for the Public Comment Release of the public health assessment for the Y-12 Uranium Releases at the Oak Ridge Reservation. We have also discussed our comments with ATSDR and agree that there are no current public exposure concerns from releases from the Y-12 facility in Scarboro.

In general, we understand the differing purposes between ATSDR's Public Health Assessment (PHA) process and EPA site-specific risk assessments; however, as Region 4 stated in its December 1, 2003 letter to Jack Hanley, "EPA does not agree with the dose or risk criteria ATSDR uses for assessing potential long-term chronic cancer risks, (i.e., 5000 mrem/year over 70 years). We understand that ATSDR currently uses the Superfund risk range for chemical carcinogens but not for radionuclides. Although EPA risk assessments and ATSDR public health assessments are not equivalent, EPA believes that ATSDR should be consistent and use the Superfund risk range for both chemical and radiation risks."

We also continue to believe that uncertainty analysis is essential to support the conclusions reached in this assessment. We understand that ATSDR plans to use an external panel of epidemiologists and radiation experts to review the PHA and will consider changes based on their input. Along with region 4, we support this approach and look forward to seeing the results of their review.

Please feel free to contact Frank Marcinowski at 202-343-9437 if you have questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Cotsworth". The signature is written in black ink and is positioned above the printed name and title.

Elizabeth Cotsworth, Director
Office of Radiation and Indoor Air